

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-365-E

In the Matter of:)
)
Exploration of a South Carolina)
Competitive Procurement Program)
for the Competitive Procurement of)
Energy and Capacity from Solar and)
Other Renewable Energy Facilities)
by an Electrical Utility as Allowed)
by South Carolina Code Section 58-)
41-20(E)(2))

PETITION TO INTERVENE

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”), through counsel, hereby petition the Public Service Commission of South Carolina (“Commission”), pursuant to R. 103-825 of the Commission’s rules, to intervene in the above-captioned docket. In support of this petition, Petitioners state as follows:

1. On November 25, 2019, the Commission opened a generic docket to explore the development of a competitive renewable energy procurement program in South Carolina pursuant to S.C. Code Ann. Section 58-41-20(E)(2). The Commission has scheduled a generic hearing on competitive procurement for March 9, 2021, and has invited interested stakeholders to submit comments, testimony, and exhibits concerning the following aspects of competitive procurement programs: best practices, costs and benefits to utility ratepayers, and impacts on the IRP process, interconnection, energy storage, and queue reform. The Commission has also requested to hear about different types of

competitive procurement programs and the corresponding benefits, savings, costs, and challenges.

2. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from the regulated utilities in South Carolina and who would be directly impacted by the Commission's development of a competitive renewable energy procurement program.

3. SACE is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida. SACE has members in South Carolina who receive electricity service from regulated utilities in South Carolina and who would be directly impacted by the Commission's development of a competitive renewable energy procurement program.

4. Petitioners and their members have a direct and substantial interest in the development of programs for the competitive procurement of renewable energy in South Carolina. Competitive procurement programs have the potential to reduce rates, improve risk management, enhance supply diversity, and prepare for future coal retirement. Thus, to the extent the Commission adopts various stakeholder recommendations relating to competitive procurement programs in this proceeding, the rates and service provided to

Petitioners and their members will be affected. Petitioners are also interested in promoting industry best practices for competitive renewable energy procurement that would support a successful program that benefits and protects ratepayers.

5. Petitioners seek to intervene in this proceeding in order to advocate for the competitive procurement programs that benefit ratepayers and promote the development of renewable energy. If allowed to intervene, Petitioners plan to participate in the generic hearing.

6. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 19th day of February, 2021.

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CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of Petition to Intervene by electronic mail or U.S. First Class Mail at the addresses set forth below:

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This the 19th day of February, 2021.

s/ Martina R. Cattles